

David M. Friedman (DF-4278)  
David S. Rosner (DR-4214)  
Andrew K. Glenn (AG-9934)  
KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP  
1633 Broadway  
New York, New York 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800

Attorneys for Bay Harbour Management L.C.,  
Bay Harbour Master Ltd., Trophy Hunter  
Investments, Ltd., BHCO Master, Ltd., MSS Distressed  
& Opportunities 2 and Institutional Benchmarks

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	: Chapter 11
LEHMAN BROTHERS HOLDINGS, INC., <i>et al.</i>	:
	: Case No. 08-13555 (JMP)
Debtor.	:
	: (Jointly Administered)
	:

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**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Bay Harbour Management L.C., Bay Harbour Master Ltd., Trophy Hunter Investments, Ltd., BHCO Master, Ltd., MSS Distressed & Opportunities 2 and Institutional Benchmarks (collectively, "Bay Harbour"), creditor and party in interest under section 1109(b) of the Bankruptcy Code, hereby appears through its counsel Kasowitz, Benson, Torres & Friedman LLP. Such counsel hereby enters its appearance pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

**PLEASE TAKE FURTHER NOTICE** that pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that an entry be made on the Clerk's matrix, if any, in this

case, and that copies of all notices and pleadings given or filed, in this case, be delivered to and served upon the persons set forth below:

David M. Friedman, Esq.  
David S. Rosner, Esq.  
Andrew K. Glenn, Esq.  
Kasowitz, Benson, Torres  
& Friedman LLP  
1633 Broadway  
New York, New York 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800  
Email:  
[dfriedman@kasowitz.com](mailto:dfriedman@kasowitz.com)  
[drosner@kasowitz.com](mailto:drosner@kasowitz.com)  
[aglenn@kasowitz.com](mailto:aglenn@kasowitz.com)

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, and any statement of affairs, operating report, or schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any right or interest of any creditor or party in interest in this case, with respect to (a) the debtors, (b) property of the debtors' estates, or proceeds thereof, in which the debtors may claim an interest, or (c) property or proceeds thereof in possession, custody, or control of others that any of the debtors may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by the undersigned.

**PLEASE TAKE FURTHER NOTICE** that neither this notice nor any later appearance, pleading, claim, or suit waives (1) the right to have final orders in noncore matters entered only

after *de novo* review by a District Court Judge, (2) the right to trial by jury in any proceedings so triable in this case, controversy, or proceeding related to this case, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, including the right to contest the jurisdiction of the Bankruptcy Court over Bay Harbour, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: September 25, 2008  
New York, New York

By: /s/ Andrew K. Glenn  
David M. Friedman (DF-4278)  
David S. Rosner (DR-4214)  
Andrew K. Glenn (AG-9934)  
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& FRIEDMAN LLP  
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Telephone: (212) 506-1700  
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*Attorneys for Bay Harbour Management L.C., Bay  
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Ltd., BHCO Master, Ltd., MSS Distressed &  
Opportunities 2 and Institutional Benchmarks*